



jail cell at Lincoln County Jail was searched and Defendant was transferred to St. Genevieve County Jail. Nothing improper was discovered through the search of Defendant's jail cell. Upon information and belief, Defendant states that the search of his jail cell and transfer from Lincoln County Jail was performed at the request of the United States Attorney's office with no evidence of misconduct by Defendant.

3. Defendant was housed at the St. Genevieve County Jail from approximately December 22, 2016 to March 1, 2017, when the United States Marshals Service transferred Defendant to the Cape Girardeau County Jail in Cape Girardeau, Missouri. The United States Marshals office has advised CJA defense counsel that this transfer was performed at the request of the United States Attorney's office. Defendant did not engage in any form of misconduct while housed at the St. Genevieve County Jail, and there is no legitimate basis for the transfer complained of.

4. Defendant is a paralegal, who has been very active in helping to prepare his defense. Indeed, Defendant has prepared and filed Pro Se Motions for relief. Defendant requires access to a law library in order to assist in his defense, and requires access to a computer with which to review discovery material produced by the Government. It should be noted, that the Government has only produced critical discovery material for review by this Defendant on compact disc (CD) and refuses to permit Defendant to receive printed copies of said discovery. Additionally, the two compact discs furnished for review by this Defendant have both malfunctioned and can't be opened. Please note that Defendant has signed a confidentiality Agreement and assurance of compliance relative to Government discovery material. There is therefore no justification for the Government's refusal to permit Defendant to have printed copies of the discovery.

5. While law library and computer resources were available to Defendant at the Lincoln County Jail and the St. Genevieve County Jail, Defendant does not believe that such resources are available to Defendant at the Cape Girardeau County Jail.

6. Moreover, the transfer of Defendant to Cape Girardeau County Jail operates to create an undue hardship on CJA defense counsel, who now has to travel almost 4 hours (roundtrip) and 216 miles (roundtrip) to consult with Defendant.

WHEREFORE, Defendant respectfully requests that this Court enter its order, directing that the U.S. Marshals transfer Defendant from the Cape Girardeau County Jail to the St. Genevieve County Jail, the St. Louis County Jail or the St. Charles County Jail (which all have law library and computer resources).

Respectfully submitted,  
THE HALE LAW FIRM

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**CERTIFICATE OF SERVICE**

This is to certify that on March 2, 2017, the foregoing was filed electronically, with the office of the Clerk of this Court to be delivered to all counsel of record.

/S/ Larry D. Hale  
Larry D. Hale